

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

1. The parties, through their undersigned counsel, hereby respectfully move for the entry of a protective order in the above-captioned action. The grounds for this joint motion are as follows:

2. Plaintiffs United States, the Commonwealth of Virginia, and the States of California, Colorado, Connecticut, New Jersey, New York, Rhode Island, and Tennessee (“Plaintiffs”) initiated this action on January 24, 2023, against defendant Google LLC, alleging violations of the antitrust laws. ECF 1.

3. As part of the discovery process, both parties have identified, and requested, the production of certain materials that contain sensitive business information belonging to Google LLC and third parties.

4. In order to permit the parties to disclose information that is relevant to the claim and/or defenses in this action and proportional to the needs of the case, while simultaneously securing sensitive information, the parties respectfully request that this Court enter the attached proposed order, which sets forth agreed-upon procedures that shall be followed with respect to such sensitive information.

5. The parties have also begun preliminary discussions regarding how to coordinate this action and the related actions now pending in the U.S. District Court for the Southern District of New York under docket number 21-md-3010-PKC (the “MDL”), including potential arrangements for sharing of documents, data, depositions, and expert materials. The parties have not finalized their respective positions, but they have agreed to present their respective positions to this Court and the presiding District Judge in the MDL by April 28, 2023, after completing a meet and confer process in this action, and making good faith efforts to complete a meet and confer process with the parties in the MDL.

Dated: April 3, 2023

Respectfully submitted,

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